

# CPM United Kingdom Ltd



## 2019 Modern Slavery Act Statement

# PREFACE

**By Michelle Tugwell**

Chief People Officer of the CPM Group

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CPM United Kingdom Ltd (CPM) has been operating since 1936 and has successfully established itself as Europe's leading sales development agency, with a client base we are incredibly proud of.

Our Values: Freedom, Innovation, Excellence, Respect and Integrity – continue to lie at the heart of our CPM UK business.

We encourage our people to adopt a healthy work-life balance and this focus on the wellbeing of our employees has continued to be a key priority during the recent pandemic related challenges the world has experienced.

We truly value our people and our diversity, recognising the importance of treating others as we would like to be treated. We are open and honest with our people, our clients and our community, ensuring we operate with absolute integrity. We also have mechanisms in place to make sure our clients and employees can give us regular and honest feedback so that we can continuously improve.

Whether we are representing our clients, or ourselves, CPM maintains the highest ethical standards and complies with all legal and regulatory codes at industry, national and international level.

We appreciate we cannot be complacent, and we regularly review our policies and procedures, to identify opportunities to improve. We recognise the importance of publishing this annual statement to highlight our ongoing commitment to ensuring that our business in the UK is operating in accordance with the requirements of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

# ORGANISATION STRUCTURE

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CPM is owned by Omnicom Group – which is an inter-connected global network of leading marketing communications companies. Omnicom’s portfolio provides the best talent, creativity, technology and innovation to some of the world’s most iconic and successful brands. Omnicom offer a diverse, comprehensive range of marketing solutions spanning brand advertising, customer relationship management (CRM), media planning and buying services, public relations and numerous speciality communications services to drive bottom-line results for our clients.

Registered Office: CPM United Kingdom Ltd, Bankside 3, 90-100 Southwark Street, London, SE1 0SW.

Within the Omnicom group CPM report into the Omnicom Specialty Marketing Group.

CPM’s business model is delivered via a range of core services of sales merchandising, auditing, experiential marketing and customer care programmes.

CPM has a clear and compelling purpose, “to win customers and sell products for our Clients”. We are passionate about growing brands and our Clients’ businesses by delivering Sales face to face, on the phone and via the web.

# OUR COMMITMENT TO HUMAN RIGHTS

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As part of Omnicom Group, we are committed to supporting and respecting internationally proclaimed human rights. This is recognised by Omnicom Group having committed its support to the ten principles of the Global Compact, with respect to human rights, labour, environment and anti-corruption.

CPM therefore ensures that within our sphere of influence, we are always operating ethically and in full compliance with all UK laws applicable to human rights, labour, the environment and anti-corruption.

The Omnicom Code of Conduct further underpins this commitment for CPM and all other Omnicom Group companies to ensure that we operate ethically and in accordance with the laws, rules and regulations of the countries in which we operate.

CPM’s commitment to doing business ethically and legally is underpinned by our core values:

**Freedom** - Always creating an environment where we trust and empower our people to do the right thing.

**Innovation** - Always thinking of what’s next.

**Excellence** - Always striving to be the best. Excellence is an attitude, not a skill.

**Respect** - Always valuing our people and our diversity. Treating others as we would like to be treated.

**Integrity** - Always being sincere, open and honest with our people, our clients and our community.

Our leadership team have clear written policies and procedures and are fully supported by professional legal advisors to ensure we meet our legal obligations in managing our people.

Our policies and procedures are regularly reviewed to ensure that they are in line with current UK labour laws. Since 1992 CPM has maintained ISO9001 accreditation which sets out a framework from which we have built our management systems, including our policies, objectives, processes, procedures, measures and continuous improvement activities.

CPM's People Hub incorporating our Human Resource, Recruitment, Reward and Talent teams, work closely with our leadership teams to ensure that they are trained to manage our people in line with the 'CPM Way of Managing our People' which ensures consistency of approach and ensures we meet our legal obligations and human rights commitments.

Risk assessments are undertaken and regularly reviewed to ensure that the working environment for all employees is kept as safe as possible. This ensures that no employees are being put into a working environment which has any hazards that are considered unacceptably managed.

Pre-employment checks are undertaken to ensure that before offering employment we have first established the prospective employee's legal right to work in the UK.

We have a zero tolerance for any CPM employees who knowingly violate any UK laws, and the circumstances of any case will be looked at individually.

CPM encourages a free and open culture in dealings between its managers, employees and all people with whom it engages in business and legal relations. CPM recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the organisation's success ensured. Our 'Whistleblowing Policy' ensures that all employees have a clear avenue open to them to raise concerns that are in the public interest, without fear of reprisal.

Similarly, our 'Grievance Procedure' offers CPM employees, a clear route to raise any issues of concern in relation to their employment with CPM.

We have been re-awarded the Investor's In People 'Gold' status again this year, which is a significant achievement. It continues to demonstrate that we believe our colleagues are at the heart of our business and developing and recognising our people is core to our overall business success.

# CPM SUPPLY CHAIN

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Our clients are all well established businesses in the UK, with internationally recognised brands that we represent. All the businesses that we work for are similarly established and regulated as we are to ensure that they would not be intentionally or unintentionally involved in modern slavery or human trafficking.

CPM is involved in a multi-million-pound supply chain and as such we regularly buy goods and services every year. Over the last couple of years, we have engaged with approximately 1,800 suppliers. Of these suppliers about 92% are based or have a presence in the UK. The rest are based or have a presence in the European Union (EU) and North America, with less than 1% being outside the EU or North America.

The top three categories of CPM procurement spend (accounting for more than 75%) comprise:

- Fleet Management – which is outsourced and managed by Lex Autolease
- Travel and Accommodation – which is managed by Inntel
- IT and telecom equipment – which is managed by Omni-ISG

Lex Autolease, Inntel and Omni-ISG have all been carefully selected, giving CPM absolute confidence that they operate their business to the same ethical standards that CPM operates.

## OUR UK DUE DILIGENCE AND MONITORING PROCESSES

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We are confident that the CPM business does not directly fall foul of the Modern Slavery Act 2015. Our internal systems ensure that the employees we engage are never being paid less than the National Minimum wage and operate in line with the Working Time Regulations. We can equally be confident that every employee has the right to work in the UK and is working for our company at their own will.

We have strengthened our due diligence when engaging with new supply chains, to provide a pool of validated suppliers, contractors and vendors who meet the specifics of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

Last year when compiling this statement, we identified opportunities to strengthen our processes when engaging new CPM suppliers in the UK. Our focus has been on even greater rigor in reviewing prospective supplier's compliance in this area, with greater weighting being given to selecting suppliers who show a higher commitment to the prevention of slavery and human trafficking. We have commenced our review of our Procurement and Supplier Control Policy to ensure that our business in the UK is operating in accordance with the requirements of section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

# CPM COMMUNICATION & TRAINING ON SLAVERY AND HUMAN TRAFFICKING

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The awareness of our commitment to Modern Slavery is highlighted in our communications and our plans for future training are communicated using the same platform.

We have initiated a project to streamline the buyers within our business. As part of this initiative we will be issuing training out to all newly designated buyers, to understand the nature of modern slavery and human trafficking risks.

All new suppliers and vendors, with an annual turnover of +£36 million must provide evidence of their adherence to the Modern Slavery Act 2015, before we can engage in business with them.

## PROGRESS OVER THE LAST YEAR

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Review of our policies and procedures:

- Our Equal Opportunities Policy has now been strengthened to include our policy on Diversity and Inclusion and has been published on our intranet for all employees to have access to it.
- We have also introduced the new Dignity at Work statement and once again this has been published on our intranet.
- The updated Omnicom Code of Conduct has also been published on our intranet.
- We have made good progress with drafting our Procurement and Supplier Control Policy.
- All new supplier and vendors, with an annual turnover of +£36 million must provide evidence of their adherence to the Modern Slavery Act 2015.

For our biggest suppliers, we have obtained copies of their Modern Slavery Statements from their corporate websites. Where this has not been possible, we have approached them directly to now provide us with a copy of their statements.

Omnicom have added further mandatory training for all employees, including Ethics and Code of Conduct, Mitigating the risks of facilitating tax evasion; anti-bribery and corruption.

## LOOKING AHEAD

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CPM has delegated responsibility to myself, as People Director for the CPM UK business, since January 2020 to continue our focus on Modern Slavery and driving awareness of this through our business.

CPM will continuously look to review its approach and processes to prevent slavery and human trafficking, and to identify further opportunities to improve. We will look to play a proactive role within our supply chain to drive awareness of this subject and to share thoughts

on how we can all work together to ensure that slavery and human trafficking does not exist within our supply chain.

One of our key focuses in the coming year is a review of the new supplier set up processes to ensure that the appropriate measures are in place to check compliance with the Modern Slavery Act requirements including, where applicable, a published Modern Slavery Statement.

We will continue the review of our Procurement and Supplier Control Policy.

As the People Director for CPM UK, I have responsibility for HR, Training, Recruitment and Reward, alongside ensuring our policies and procedures reflect the type of business we are and our values. We remain focused on Modern Slavery, looking for opportunities to continue improving our awareness in this area.

We will continue with our training programmes to ensure that those involved in our procurement processes remain vigilant in this area. We will ensure that they very clearly understand the nature of slavery and human trafficking risks, and the critical need to assess and understand what steps prospective suppliers are taking to prevent slavery and human trafficking in their own businesses.

Annually, when we publish CPM's Modern Slavery Act Statement, we will ensure that this is brought to the attention of all CPM employees. This will support reinforcing our commitment as a business to preventing slavery and human trafficking and act as a reminder for all employees of the important role they play in making this happen.

CPM will publish its annual Modern Slavery Statement within 6 months of the financial year end which is in December.

The CPM board of directors have approved this statement.



Signed for and on behalf of CPM United  
Kingdom Ltd

Claire Wicks

People Director, CPM UK

30th May 2020